

OSBORN LAW P.C.

Daniel A. Osborn, Esq.
Lindsay M. Trust, Esq.

dosborn@osbornlawpc.com
ltrust@osbornlawpc.com

MEMORANDUM ENDORSED

April 23, 2025

VIA ECF

Honorable Gabriel W. Gorenstein
United States District Court
Southern District of New York
40 Foley Square
New York, NY 10007

Re: *Johnson v. Commissioner of Social Security*
Civil Action No. 1:25-cv-00878-GWG

Dear Judge Gorenstein,

We write on behalf of our client, Beatriz Delvalle Johnson, with the consent of the defense, to request additional time to file her motion for judgment on the pleadings which is currently due on May 2, 2025, per the Court's April 3, 2025 Scheduling Order. This is the parties' first request for an extension. Plaintiff's counsel needs additional time due to a heavy caseload in the next several weeks, an upcoming trial, and an upcoming Demurrer hearing.

After conferring with the defendant, the parties have agreed to proceed according to the following amended scheduling order, subject to the Court's approval:

- Plaintiff to file her motion for judgment on the pleadings on or before: **July 11, 2025;**
- Defendant to file its response to plaintiff's motion/cross motion on or before: **September 19, 2025;** and
- Plaintiff to file her reply, if any, on or before: **October 3, 2025.**

Honorable Gabriel W. Gorenstein
April 23, 2025
Page Two

Thank you for your consideration of this request.


Respectfully submitted,

s/Daniel A. Osborn
Daniel A. Osborn
OSBORN LAW, P.C.
43 West 43rd Street, Suite 131
New York, New York 10036
Telephone: 212-725-9800
Facsimile: 212-500-5115
dosborn@osbornlawpc.com

cc: Karen G. Fiszer, Esq. (by ECF)

The proposed schedule is approved. Given the length of the briefing schedule, the parties should not expect any further extensions.

So Ordered.



GABRIEL W. GORENSTEIN
United States Magistrate Judge
April 24, 2025